

## ANIXTER SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2017

Anixter is a leading global distributor of network & security solutions, electrical & electronic solutions and utility power solutions. We help build, connect, protect, and power valuable assets and critical infrastructures. We promote responsible commercial practices at every level of our business and are committed to conducting our business ethically, honestly and in a lawful manner.

This statement sets out the steps taken during the financial year ended December 29, 2017 to ensure that slavery and human trafficking is not taking place in our supply chains and our own business.<sup>1</sup>

### Our business and supply chains

Anixter group conducts its business in four regions, North America, Caribbean and Latin America, Asia-Pacific and Europe, Middle East and Africa. With more than 600,000 products in stock globally, our key suppliers are manufacturers and other distributors of such products. We endeavour to build up long-term relationships with many of our suppliers, which help us to ensure that products in our inventory have been sourced in an ethical and lawful manner.

In addition to these product vendors, we also have a number of vendors which help us to run our business, such as IT, security, legal, financial and cleaning services providers, customs brokers, freight forwarders, commission agents and others.

### Policies and contractual controls

Anixter's philosophy is enshrined in the [Blue Book](#), which represents our beliefs and ethos that define our business style. The first principle of the Blue Book is "People come first".

In 2012, Anixter became a participant to the United Nations Global Compact, the world's largest corporate sustainability initiative. Anixter has embraced the ten principles of the Global Compact, including principle 4 which prohibits all forms of forced and compulsory labour. You can find Anixter Corporate Responsibility Report which describes our actions to continually improve the integration of the Global Compact and its principles into our business [here](#).

Our internal policies include [Anixter's Ethics Policy](#), which applies globally and is designed to assist us in complying with the laws and ethical principles that govern our business conduct.

In our standard supplier contracts, we require our suppliers to comply with [Anixter's Supplier Code of Conduct](#), which among other things, prohibit forced labor and human trafficking and require our suppliers to source products only from third parties who uphold similar standards of integrity and ethical compliance as set forth in the code.

We also operate a Business Integrity Line, where anyone may online at ([Anixter.ethicspoint.com](http://Anixter.ethicspoint.com)) or by telephone anonymously (where permitted by local law) report violations of our policies or

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<sup>1</sup> We have prepared this statement for our entire company because we have the same policies and compliance framework relating to slavery and human trafficking across our entire business globally. However, not all of the entities that are part of the Anixter group are subject to the UK Modern Slavery Act.

the law. The Business Integrity Line is operated by an independent third party and supported by Anixter's Non-Retaliation Policy that ensures that the whistleblower is appropriately protected.

### **Risk assessment and Due diligence**

Business partners that represent a greater risk are required to complete Anixter's business partner qualification process. If the business partner fails to satisfactorily complete the qualification process, they will not be paid without the prior approval of a Regional Compliance Officer.

Anixter's business partner qualification process includes a due diligence screening of all new or renewing business partners who will be performing services for or acting on Anixter's behalf in certain higher risk countries or categories identified by Anixter. Business partners who are approved are continuously monitored by Anixter.

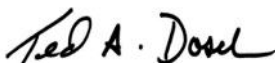
### **Training**

All our employees are trained to comply with the Ethics Policy and the Blue Book principles through a combination of online modules and targeted live training.

### **Oversight and Accountability**

All Anixter Compliance Programs, including our efforts to combat slavery and human trafficking, are overseen and enforced at the highest level in the organisation. The overall Compliance Programme direction is determined by the Executive Compliance Committee and Chief Compliance Officer. Our Chief Compliance Officer reports quarterly to Anixter's Audit Committee on the company's compliance risks and initiatives. We have followed this governance approach at a regional level and established Regional Compliance Committees across the globe. Our Regional Compliance Committees are chaired by a Regional Compliance Officer, each of whom sits on the Executive Compliance Committee and reports annually to the Executive Compliance Committee on ethics and compliance risks in their respective regions.

As required by the U.K. Modern Slavery Act, this statement has been reviewed and approved by the Board of Directors of Anixter Limited, Anixter's operating entity in the U.K.



Theodore Alan Dosch

*Director*

**June 29, 2018**